

(Extension)

CONTAINS NO CBI

Glidden

THE GLIDDEN COMPANY Contains 710

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RESEARCH CENTER

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February 13, 1989 OFFICE

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Office of Toxic Substances
U.S. EPA
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CAIR
(Extension)

ATTENTION: CAIR Reporting Extension

To Whom It May Concern:

The Glidden Company (Glidden) is a major U.S. manufacturer of industrial and consumer paints and coatings. As such, Glidden is affected by the Agency's December 22, 1988, CAIR rule (effective 2/6/89) because we process one or more of the toluene diisocyanate isomers listed in that rule.

Pursuant to 40 C.F.R. Section 704.215(b), this letter serves as Glidden's written request for an extension of time to fulfill its reporting obligations. Specifically, Glidden requests that the Agency grant a 60-day extension, thus amending our reporting deadline to July 6, 1989. Unless Glidden receives written notification to the contrary, we will assume that the requested extension has been granted.

Glidden believes that the requested extension is justified and reasonable because:

- A) While the final rule was published December 22, 1988, copies of the reporting form/instructions were not available to Glidden until approximately February 1, 1989. Accordingly, it was impossible for us to appreciate and communicate the precise details of our reporting obligations.
- B) The December 22, 1988, publication date for this rule coincided with a period of national holidays which most reporting companies recognize. Further, many people schedule vacations around these holidays. Accordingly, the fact that the rule had been published was not well known until the first half of January 1989.
- C) The depth and breadth of EPA's inquiry for TDI is such that many segments of Glidden will of necessity be involved in this reporting activity. This will require the coordination of many diverse Glidden departments composed of responsible Company personnel with other ongoing responsibilities which are not directly related to regulatory compliance. Also, it may be necessary for these persons to recall certain records which may have been moved to permanent storage locations removed from their normal places of business.



Paints—The World Leader

- D) Finally, reporting under CAIR is a new activity to both EPA and the regulated community, including Glidden. Thus, there will undoubtedly be (in fact, already have been) numerous points which will require careful consideration and/or clarification. Glidden believes it will be in the best interests of both EPA and affected reporting parties to ensure that we fulfill the purposes and particulars of this rule to the best of our ability. To do so, we will require more than the 90-day reporting period established in the final rule.

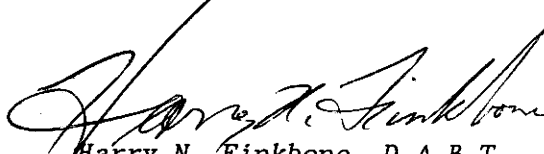
Glidden appreciates the Agency's attention to this request and, as stated above, will assume the extension to have been granted unless notified to the contrary. Questions and/or your response should be directed to:

Mr. Harry N. Finkbone
Manager, Product Safety & Toxicology
The Glidden Company
16651 Sprague Road
Strongsville, OH 44136

Phone: (216) 826-5279

Sincerely,

THE GLIDDEN COMPANY



Harry N. Finkbone, D.A.B.T.
Manager, Product Safety & Toxicology

HNF/tab
BB9

cc: T. J. Puette - GHB